

EXHIBIT A

The REKK User Defendants' Role in the Scheme

1. **Andrew Ling:** On April 22, 2023, Andrew Ling placed an Amazon order for five Apple iPads causing the products to be shipped via Amazon Logistics. The products were delivered to Andrew Ling's address of record on April 22 and 23, 2023. Andrew Ling paid Amazon \$2,172.05 via an interstate electronic financial transaction for the products. Subsequently, Andrew Ling engaged REKK to receive a fraudulent refund of the products. On April 22, 2023, an Amazon fulfillment center associate was the victim of an insider phishing attack orchestrated upon information and belief by REKK, in which REKK falsely claimed to be "Amazon HR" and coerced the associate to provide their account login credentials. As a result, their Amazon account was used to approve all five of Andrew Ling's orders as returned, despite none of the products being returned to Amazon. As a result, on April 29, 2023, Amazon was fraudulently induced to refund Andrew Ling \$2,172.05 via interstate electronic financial transaction. Andrew Ling retained the products and the refund. Upon information and belief, Andrew Ling paid the REKK Operator Defendants a percentage of the fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel, as evidence of the successful refund.

2. **Brandon Sukhram:** On May 3, 2023, Brandon Sukhram placed an Amazon order for two high-value gaming electronics, causing the products to be shipped via Amazon Logistics. The products were delivered to Brandon Sukhram's address of record on May 8, 2023. Brandon Sukhram paid Amazon €1,047.80 Euro via international electronic financial transaction for the products. Subsequently, Brandon Sukhram engaged REKK to receive a fraudulent refund of the products. On May 9, 2023, Brandon Sukhram, or REKK acting on behalf of Brandon Sukhram, contacted Amazon Customer Service stating that he received empty packages in place of the products ordered. As a result, on May 10, 2023, Amazon was fraudulently induced to partially refund Brandon Sukhram €309.90 Euro via international electronic financial transaction. Brandon Sukhram retained the products and the refund. Upon information and belief, Brandon Sukhram paid the REKK Operator Defendants a percentage of

1 the fraudulently obtained refund and sent them a vouch, which was posted to the Telegram
2 channel, as evidence of the successful refund.

3 **3. Cosmin Sopca:** On June 1, 2022, Cosmin Sopca placed an Amazon order for one
4 motherboard fan, one electronic toothbrush, and one compressed air duster, causing the products
5 to be shipped via UPS. The products were delivered to Cosmin Sopca's address of record on
6 June 8, 2022. Cosmin Sopca paid Amazon 846.41 GBP via international electronic financial
7 transaction for the products. Subsequently, Cosmin Sopca engaged REKK to receive a
8 fraudulent refund of the products. On June 5, 2022, REKK manipulated the shipping data of the
9 products, fraudulently inducing Amazon to refund Cosmin Sopca 846.41 GBP via international
10 electronic financial transaction. Cosmin Sopca retained the products and the refund. Upon
11 information and belief, Cosmin Sopca paid the REKK Operator Defendants a percentage of the
12 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
13 as evidence of the successful refund.

14 **4. Jenny Tran:** On April 19, 2023, Jenny Tran placed an Amazon order for two
15 Apple MacBook Air laptops, causing the products to be shipped via Amazon Logistics. The
16 products were delivered to Jenny Tran's address of record on April 20, 2023. Jenny Tran paid
17 Amazon 2,198 GBP via international electronic financial transaction for the product.
18 Subsequently, Jenny Tran engaged REKK to receive a fraudulent refund of the products. On
19 May 8, 2023, Amazon received a falsified police report from Jenny Tran after Jenny Tran, or
20 REKK acting on behalf of Jenny Tran, claimed they had received an empty box. As a result,
21 Amazon was fraudulently induced to refund Jenny Tran 2,198 GBP via international electronic
22 financial transaction. Jenny Tran retained the products and the refund. Upon information and
23 belief, Jenny Tran paid the REKK Operator Defendants a percentage of the fraudulently obtained
24 refund and sent them a vouch, which was posted to the Telegram channel, as evidence of the
25 successful refund.

26 **5. Olaf Booij:** On January 25, 2023, Olaf Booij placed an Amazon order for two
27 Samsung Galaxies and an Apple iPad, causing the products to be shipped via DHL. The

1 products were delivered to Olaf Booij's address of record on January 26, 2023. Olaf Booij paid
2 Amazon €2,116.02 Euro via international electronic financial transaction for the products.
3 Subsequently, Olaf Booij engaged REKK to receive a fraudulent refund of the products. On
4 May 2, 2023, REKK compromised an external Amazon tool used by sellers to process inventory,
5 fraudulently inducing Amazon to refund Olaf Booij €1,454.91 Euro via international electronic
6 financial transaction despite the products never being returned. Olaf Booij retained the products
7 and the refund. Upon information and belief, Olaf Booij paid the REKK Operator Defendants a
8 percentage of the fraudulently obtained refund and sent them a vouch, which was posted to the
9 Telegram channel, as evidence of the successful refund.

10 6. **Ryan Bates:** On April 11, 2023, Ryan Bates placed an Amazon order for a
11 gaming monitor and a gaming PC, causing the products to be shipped via Amazon Logistics.
12 The products were delivered to Ryan Bates's address of record on April 13, 2023. Ryan Bates
13 paid Amazon 7,520.99 CDN via international electronic financial transaction for the product.
14 Subsequently, Ryan Bates engaged REKK to receive a fraudulent refund of the products. On
15 April 21, 2023, Amazon received a falsified police report from Ryan Bates after Ryan Bates or
16 REKK acting on behalf of Ryan Bates, claimed they had received an empty box. As a result,
17 Amazon was fraudulently induced to refund Ryan Bates 7,520.99 CDN via international
18 electronic financial transaction. Ryan Bates retained the products and the refund. Upon
19 information and belief, Ryan Bates paid the REKK Operator Defendants a percentage of the
20 fraudulently obtained refund and sent them a vouch, which was posted to the Telegram channel,
21 as evidence of the successful refund.